REMARKS

Most claim amendments have been so as to improve language. Claim 1 has also been amended to recite that packets are forwarded based on the selected forwarding rule, rather than on all forwarding rules. Support for this limitation is found for example in Figure 11 of the application. Claim 1 has also been amended to clarify that the output service interface to which packets are forwarded is determined based on the destination address of the packets and on the information in the selected forwarding rule. This is simply a clarification, as this idea was already present in the previous language of "forwarding said packet to one of said output service interfaces based on ...". No new subject matter has been added.

The Examiner has rejected claims 1-8 and 11-21 under 35 U.S.C. 103(a) as being obvious having regard to U.S. Patent 6,085,238 issued to Yuasa in view of U.S. Patent 5,825,772 issued to Dobbins.

Claim 1 of the present application is directed to a method of forwarding packets in a communication system. The method includes maintaining multiple forwarding rules, the forwarding rules based on routing topology and policing information relevant to each of multiple distinct and isolated user networks. The Examiner has equated this element with the combination of the "forwarding rules" of Dobbins, which the Examiner states is taught at Figure 7, at column 17 lines 22 to 43, and at column 13 lines 48 to 59. However, the Applicant submits that Dobbins is not teaching maintaining multiple forwarding rules based on routing topology and policing information relevant to each of multiple distinct and isolated user networks. Figure 7 and column 17 lines 22 to 43 explicitly describe an "access rule", and not a forwarding rule. The access rule taught by Dobbins is simply a set of conditions which must be met for a connection to be established, and is can not be considered a forwarding rule as the access rule is not used in anyway to determine to where a packet is to be forwarded. As can be seen from Figure 7b and steps 103-107 of Figure 7a of Dobbins, the purpose of the access policy rule is for the ingress switch to determine whether a connection is to be established or whether the packet is to be dropped. If the destination address and the source address are on the same VLAN or if they both share an "open" policy, and if the destination

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address and the source address are not on the same port, then a connection is established. Otherwise, the packet is dropped.

Dobbins does teach use of routing topology at column 13 lines 48 to 59. However, this has nothing to do with application of the access rule. The distinct treatment of the access rule from the routing topology as taught by Dobbins means that when a packet arrives, the access rule is applied to determine whether the source of the packet and the destination of the packet are such that the delivery of the packet is permitted. If the source of the packet and the destination of the packet are on the same VLAN, or if both the source of the packet and the destination of the packet have OPEN policies, then the connection is established. Otherwise, the connection is not established.

Only if the connection is established is routing topology then taken into account in determining a complete path from the source to the destination. Determination of the path using routing topology is done completely independently of the access rule.

In contrast, claim 1 (and claim 8) teach use of multiple forwarding rules based on routing topology and policing information as a single element. This allows all packets to be forwarded, the forwarding destination (the output service interface) being determined by the forwarding rules appropriate to the source address of the packets.

Claim 1 also includes selecting an appropriate forwarding rule based on a source address in the packets. This is an element not taught by Dobbins. The Examiner has equated this element with "selecting a rule in order to forward a packet, based on the source address, to an output interface", and has cited column 17 lines 22 to 43. As explained above, although this may be "selecting a rule", this is not selecting a forwarding rule as the term "forwarding rule" is used in the claims and in the description of the present application.

Amended claim 1 also includes forwarding the packets to one of the output service interfaces, the decision as to which output service interface to forward the packets to being based on a destination address in the packets and information in the appropriate forwarding rule. This is an element not taught by Dobbins. The Examiner has equated this with "selecting a rule in order to forward a packet, based on the source address, to an output interface", and has cited column 17 lines 22 to 43. As explained above, the access rule to which this passage of Dobbins refers is not a forwarding rule

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based on routing topology relevant to each of the distinct and isolated user networks. The application of this access rule is simply to determine whether to establish a connection or not, and is not related to forwarding packets to an output service interface the determination of which is based on information in the forwarding rule.

In addition, none of these elements are taught by Yuasa. The remaining claims are variously dependent on claims 1 and 8 and include the same limitations discussed above. As neither Yuasa nor Dobbins, separately or in combination, teach every element of the claims of the present application, the Applicant respectfully submits that a *prima facie* case of obviousness has not been established against claims 1 to 8 and 10 to 21 of the present application.

In view of the foregoing, it is believed that the claims at present on file and as amended herein are in condition for allowance. Reconsideration and action to this end is respectfully requested.

Respectfully submitted,

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